

**Federal Defenders
OF NEW YORK, INC.**

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December 23, 2021

BY ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

RE: United States v. Michael Avenatti
19 Cr. 374 (JMF)

Dear Judge Furman:

The defense respectfully requests leave to file by December 28, 2021 a motion to preclude expert testimony for which the Government provided notice on December 13, 2021. The Government takes no position on this application.

Respectfully Submitted,

/s/

Robert M. Baum
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Andrew J. Dalack
Assistant Federal Defenders

Counsel for Michael Avenatti